## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

SECURITIES AND EXCHANGE COMMISSION,	)
Plaintiff,	) ) Civil Action No.:4:23-cv-676-0
V.	) ) JURY TRIAL DEMANDED
THOMAS COLLINS, PATRICK THOMAS, GARY KOULETAS,	) )
SCOTT LEVINE, and BRIAN KINGSFIELD,	) ) )
Defendants.	) ) )

## PLAINTIFF'S UNOPPOSED MOTION FOR ENTRY OF AGREED FINAL JUDGMENTS AS TO THOMAS COLLINS, PATRICK THOMAS, GARY KOULETAS, SCOTT LEVINE, AND BRIAN KINGSFIELD

Plaintiff Securities and Exchange Commission ("Commission" or "SEC") respectfully moves the Court to enter Final Judgments against Defendants Thomas Collins, Patrick Thomas, Gary Kouletas, Scott Levine, and Brian Kingsfield ("Defendants") in the form attached hereto. In support of this motion, the Commission states as follows:

- 1. The Commission filed this civil action on June 30, 2023, alleging that Defendants committed violations of the federal securities laws. *See* Dkt. No. 1.
- 2. The Commission has reached a settlement with Defendants. Defendants have executed written consents (the "Consents") that set out the terms of the agreements. True and correct copies of the Consents are filed herewith as <a href="Exhibit A">Exhibit A</a>. Under the terms of the Consents, Defendants consent to the entry of Final Judgments. True and correct copies of the Final Judgments are attached hereto as <a href="Exhibit B">Exhibit B</a>.

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3. Under the terms of the Consents, Defendants, *inter alia*: (a) acknowledge having

been served with process; (b) acknowledge having made a general appearance; (c) admit the

Court's jurisdiction over each of them and over the subject matter of this action; and (d) consent

to the entry of the Final Judgments.

4. The Final Judgments dispose of all issues in the Commission's case against the

Defendants. However, as set forth in the Final Judgments, this Court shall retain jurisdiction of

this matter for the purposes of enforcing the terms in the Final Judgments.

For all of these reasons, the Court should grant this Motion and enter Final Judgments

against Defendants in the form agreed by the parties.

Dated: June 30, 2023 Respectfully submitted,

s/ Matthew J. Gulde

MATTHEW J. GULDE

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COUNSEL FOR PLAINTIFF SECURITIES AND

**EXCHANGE COMMISSION** 

## **CERTIFICATE OF CONFERENCE**

I hereby certify that in April and May 2023, counsel representing the Commission conferred with counsel for Defendants regarding the content of this motion and confirmed that they are not opposed to the relief sought by the SEC.

s/ Matthew J. Gulde
Matthew J. Gulde

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2023, a copy of foregoing *Unopposed Motion for Entry of Agreed Final Judgments as to Defendants Thomas Collins, Patrick Thomas, Gary Kouletas, Scott Levine, and Brian Kingsfield,* was filed electronically and served by mail as soon as practicable on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

s/ Matthew J. Gulde
Matthew J. Gulde